

11	JAMES ARMSTRONG, MONIQUE	)	Case No. C04-1536 VRW
	BAILEY, CONNIE L. BROWN, KARL	)	
12	DYSON, EDWARD FERDINAND,	)	(Case No. C01-2611 VRW)
	RICHARD FONTENBERRY, JR., NADINE	)	
13	GORDON, VICTOR HUMPHREY, TESA	)	<b>STIPULATION; ORDER THEREON</b>
	JENNINGS, DAVID JOHNWELL,	)	
14	RHEUBEN CHARLES JOHNSON, DEREK	)	
	MADARIS, GLORIA OWENS, ROY RAY,	)	
15	RICARDO RIDEOUT, SR., MARY	)	
	SIMMONS, LAMAR SIMPSON, JR., and	)	
16	TRESSA KNOX	)	

28 Due to the nature and complexity of this case, there are no other attorneys in plaintiffs'

1 counsel's office who are sufficiently familiar with either the *Armstrong* action [C01-2611 VRW]  
2 or the *Brown* action [C04-1536 VRW] to prepare and take the depositions for plaintiffs' case or  
3 to defend the depositions for plaintiffs. Because of the similarity of facts, witnesses, and legal  
4 issues in the *Armstrong* action and the *Brown* action, the discovery is overlapping, and, at the  
5 Joint Case Management Conference, before the Honorable Vaughn R. Walker, the parties had  
6 agreed to utilize the same discovery for both cases.

7 As a result of Ms. Brown's condition and required time off to rehabilitate,  
8 concomitant with the scheduling conflicts due, the parties request the discovery cut-off and  
9 hearing of dispositive motions be continued as set forth below. Ms. Brown's neurosurgeon and  
10 neurologist have cleared Ms. Brown to return to work and for litigation purposes by March 31,  
11 2006. The parties request the scheduled be continued approximately 60 days.

12 **IT IS HEREBY STIPULATED** by and between the parties hereto, through their  
13 respective counsel as undersigned, that :

- 14 1. Non-expert discovery completion date be continued from the currently scheduled  
15 date of February 14, 2006 to May 19, 2006;
- 16 2. Filing for dispositive motions, including summary judgment, be continued from  
17 the currently scheduled date of February 14, 2006 to May 19, 2006;
- 18 3. Hearing on the dispositive motions, including summary judgment, be continued  
19 from the currently scheduled date of March 21, 2006, at 2:00 p.m. to ~~June 26, 2006~~, at 2:00 p.m.;  
20 June 22, 2006
- 21 4. Expert discovery disclosure reports be continued from the currently scheduled  
22 date of March 30, 2006 to June 13, 2006;
- 23 5. Expert discovery rebuttal completion date be continued from the currently  
24 scheduled date of April 28, 2006, to July 12, 2006;
- 25 6. Completion of expert discovery be continued from the currently scheduled date of  
26 May 29, 2006 to August 11, 2006;

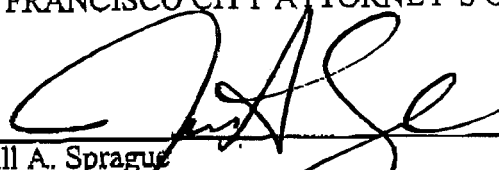
27 **[INTENTIONALLY LEFT BLANK]**  
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7. Pre-trial conference be continued from the currently scheduled date of June 16,  
2006 to August 30, 2006. August 29, 2006 at 9:00 a.m.

Dated: 12/20/05 ANDERLINI, FINKELSTEIN, EMERICK & SMOOT

By:   
PAUL J. SMOOT  
Attorneys for Plaintiff

Dated: 12/20/05 SAN FRANCISCO CITY ATTORNEY'S OFFICE

By:   
Jill A. Sprague  
Attorneys for Defendant CITY AND COUNTY OF  
SAN FRANCISCO and DEPARTMENT OF  
PUBLIC WORKS

I hereby attest that I have on file all holograph signatures for any signatures indicated by a  
"conformed" signature (/S/) within this filed document.

IT IS SO ORDERED.

Dated: \_\_\_\_\_  
December 27, 2005

ORDER

JUDGE OF THE

